

[2010R01342/JRA,RF]

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

REGINALD WARE

RECEIVED

APR 11 2011

AT 8:30 \_\_\_\_\_M  
WILLIAM T. WALSH, CLERK

: Criminal No. 11-224(WHW)  
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:  
: 18 U.S.C. § 1951(a)  
: 18 U.S.C. § 924(c)(1)(A)(ii)  
: 18 U.S.C. § 2119(1)  
: 18 U.S.C. § 2  
:  
: I N D I C T M E N T  
:  
:  
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The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

1. From in or around July 2010 through in or around  
October 2010, in Essex County and Hudson County, in the District  
of New Jersey, and elsewhere, defendant

REGINALD WARE

did knowingly and intentionally conspire and agree with at least  
one other person to obstruct, delay, and affect commerce and the  
movement of articles and commodities in commerce by robbery, and  
to commit and threaten physical violence to employees and  
customers of multiple pharmacies located in Hudson County, New  
Jersey, in furtherance of a plan and purpose to obstruct, delay,  
and affect commerce and the movement of articles and commodities  
in commerce by robbery.

Object of the Conspiracy

2. It was the object of the conspiracy for defendant REGINALD WARE and a co-conspirator ("CC-1") to rob pharmacies in Hudson County, New Jersey and to take money and pharmaceuticals.

Manner and Means of the Conspiracy

3. It was a method and means of the conspiracy that defendant REGINALD WARE and a co-conspirator would locate pharmacies in Hudson County and would use force and threats of force to rob customers and employees of money and pharmaceuticals.

4. It was a method and means of the conspiracy that defendant REGINALD WARE and a co-conspirator would brandish firearms to threaten physical violence to overcome resistance to the robbery.

5. It was a method and means of the conspiracy that defendant REGINALD WARE would sell the stolen pharmaceuticals for thousands of dollars to a street level drug supplier.

Overt Acts

6. In furtherance of the conspiracy to affect commerce and to affect the object thereof, defendant REGINALD WARE and CC-1 committed the following overt acts:

A. On or about July 27, 2010, defendant REGINALD WARE and CC-1 robbed the Wisdom Pharmacy in Hudson County, New Jersey

while brandishing firearms and forcibly stole United States Currency and pharmaceuticals.

B. On or about August 4, 2010, defendant REGINALD WARE and CC-1 robbed the Welcome Pharmacy in Hudson County, New Jersey while brandishing firearms and forcibly stole United States Currency and pharmaceuticals.

C. On or about October 12, 2010, defendant REGINALD WARE and CC-1 forcibly stole a motor vehicle from another person with the intent to cause serious physical injury while brandishing a firearm.

D. On or about October 14, 2010, defendant REGINALD WARE and CC-1 robbed the Americas Pharmacy in Hudson County, New Jersey while brandishing firearms and forcibly stole United States Currency and pharmaceuticals.

E. On or about October 14, 2010, defendant REGINALD WARE and CC-1 used the vehicle stolen on October 12, 2010 to drive to and from the robbery of the Americas Pharmacy.

F. On or about October 16, 2010, defendant REGINALD WARE and CC-1 robbed Carry Drugs in Hudson County, New Jersey while brandishing firearms and forcibly stole United States Currency and pharmaceuticals.

G. On or about October 16, 2010, defendant REGINALD WARE and CC-1 used the vehicle stolen on October 12, 2010 to drive to and from the robbery of Carry Drugs.

All in violation of Title 18, United States Code,  
Section 1951(a).

COUNT TWO

(Hobbs Act Robbery)

1. The allegations contained in paragraphs 2 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. That at all times material to this Indictment, the Wisdom Pharmacy was engaged in business as a pharmacy, in interstate commerce and an industry which affects interstate commerce.

3. That on or about July 27, 2010 in Hudson County, in the District of New Jersey, and elsewhere, defendant

REGINALD WARE

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain personal property consisting of United States currency and pharmaceuticals from the persons of and in the presence of employees and customers of the Wisdom Pharmacy, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT THREE

(Hobbs Act Robbery)

1. The allegations contained in paragraphs 2 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. That at all times material to this Indictment, the Welcome Pharmacy was engaged in business as a pharmacy, in interstate commerce and an industry which affects interstate commerce.

3. That on or about August 4, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

REGINALD WARE

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of United States currency and pharmaceuticals from the persons of and in the presence of employees and customers of the Welcome Pharmacy against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

In violation of Title 18, United States Code, Section  
1951(a) and Section 2.

COUNT FOUR

(Hobbs Act Robbery)

1. The allegations contained in paragraphs 2 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein

2. That at all times material to this Indictment, the Americas Pharmacy was engaged in business as a pharmacy, in interstate commerce and an industry which affects interstate commerce.

3. That on or about October 14, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

REGINALD WARE

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of United States currency and pharmaceuticals from the persons of and in the presence of employees and customers of the Americas Pharmacy against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

In violation of Title 18, United States Code, Section  
1951(a) and Section 2.

COUNT FIVE

(Hobbs Act Robbery)

1. The allegations contained in paragraphs 2 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. That at all times material to this Indictment, Carry Drugs was engaged in business as a pharmacy, in interstate commerce and an industry which affects interstate commerce.

3. That on or about October 16, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

REGINALD WARE

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain personal property consisting of United States currency and pharmaceuticals from the persons of and in the presence of employees and customers of Carry Drugs against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their custody.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT SIX

(Possession, Use and Carrying of a Firearm for Violent Crime)

1. The allegations contained in paragraphs 2 through 6 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 27, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

REGINALD WARE,

during and in relation to a crime of violence, specifically the robbery of the Wisdom Pharmacy as alleged in Count Two, for which the defendant could be prosecuted in a Court of the United States, did knowingly use, carry, and in furtherance of such crime possess a firearm, namely a semi-automatic pistol, which was brandished, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and Section 2.

COUNT SEVEN

(Carjacking)

1. On or about October 12, 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

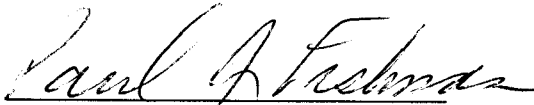
REGINALD WARE,

knowingly and with intent to cause serious bodily harm, did take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce, namely, a 2006 Honda Accord, from the person and presence of A.T. by force, violence and intimidation, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

A TRUE BILL,

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PAUL J. FISHMAN  
UNITED STATES ATTORNEY

CASE NUMBER:

11-224(WHW)

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**REGINALD WARE**

**INDICTMENT FOR**

18 U.S.C. § 1951(a)  
18 U.S.C. § 924(c)(1)(A)(ii)  
18 U.S.C. § 2119(1) and  
18 U.S.C. § 2

**A True Bill,**

**PAUL J. FISHMAN**

**U.S. ATTORNEY  
NEWARK, NEW JERSEY**

**ROBERT FRAZER**

**ASSISTANT U.S. ATTORNEY  
(973) 645-2897**